

IEU/OEA  
TSCA INSPECTION REPORT

**BURLINGTON ENVIRONMENTAL  
(DBA) PHILIP ENVIRONMENTAL**

734 S. Lucile  
Seattle, WA 89108

6/27/97

RECEIVED  
SEP 16 1997  
"SWAT Unit"  
"OWCM"

Scan as  
1 doc  
11b

**FACILITY  
ADDRESS:**

Philip Environmental  
955 Powell Ave. SW  
Renton, WA 98055

**SITE  
ADDRESS:**

Philip Environmental  
734 S. Lucile  
Seattle, WA 98108

**INSPECTION  
COMMENCED:**

6/26/97 @ 0900

**SITE  
CONTACTS:**

Dave Hague, Plant Supervisor, (206) 762-3362  
Mark Warner, P.E. Manager Regulatory Affairs, (206) 227-6138  
Alan Nilson, PCB Technician

**INSPECTION  
TEAM:**

W. Douglas Smith, Sr. Compliance Investigator, (206) 553-6700

**SITE  
BACKGROUND:**

Burlington Environmental, doing business as Philip Environmental was previously owned by Chemical Processors (CHEMPRO). The facility specializes in hazardous waste handling, storage, transporting and disposal brokering. They are a pervasively regulated industry and have routinely had TSCA, EPCRA and RCRA inspections.

**OPENING  
CONFERENCE:**

I introduced myself and showed my credentials to Dave Hague, Plant Supervisor; and Mark Warner, P.E. Manager for Regulatory

USEPA REG



0001049

Affairs from the Philip Environmental corporate offices in Renton, Washington. I explained that I wished to perform a TSCA PCB compliance inspection. I issued the TSCA Notices of Inspection and Confidentiality to Mark Warner. He signed the Notices and I retained copies of each. I said that I would like all PCB manifests, PCB Annual Reports, and PCB annual documents since the last TSCA inspection. I said that I would like to concentrate on the field portion of the inspection while I was at the facility and review the documents in my office. I requested that the documents be sent to my office within 10 working days of the close of this inspection.

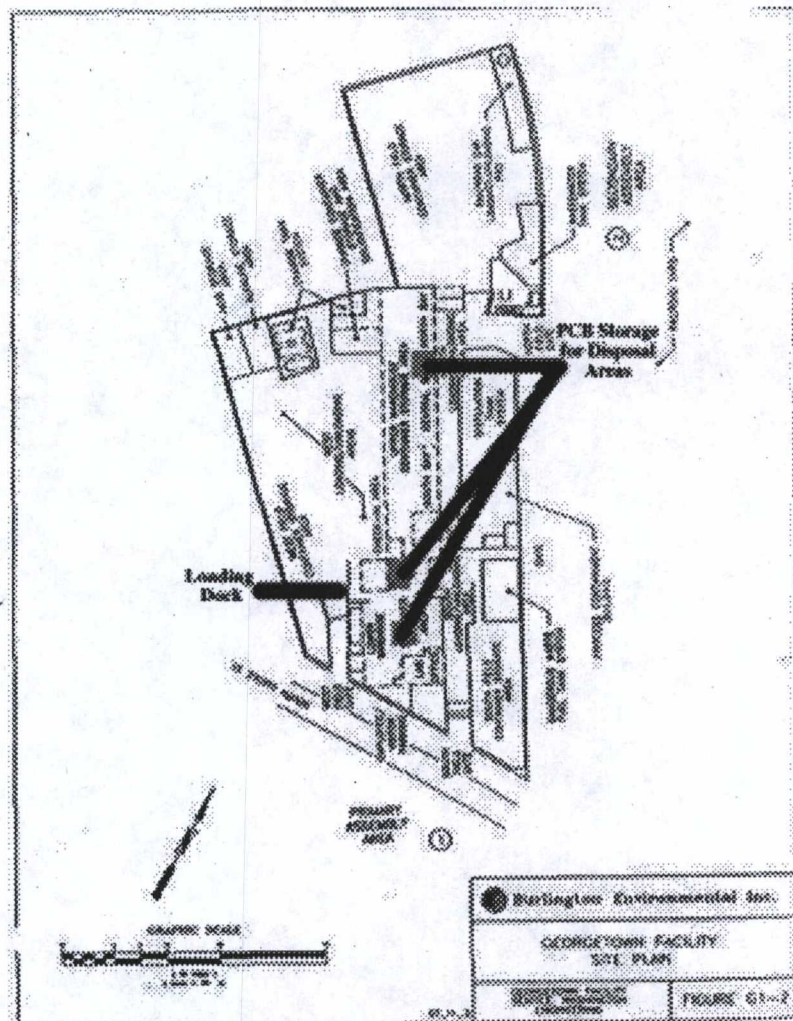
**RECORDS  
INSPECTION:**

Not done during the field portion of this inspection.

**FIELD  
INSPECTION:**

The site is located west of Interstate Highway 5 and north of Boeing Field.





PCB Storage for Disposal was in three locations which are shown on the above site diagram. Flammable liquids are kept in the north end of the warehouse area. Some materials are kept in a lockable room in the middle area of the warehouse and materials recently received or ready for shipment are kept in the area near the Laboratory, at the south end of the warehouse.





*South area PCB Storage for Disposal area.*

There were four large high voltage capacitors that were not marked with a M<sub>1</sub>. They were from Ft Wainwright AFB, Fairbanks, AK. They did not have a means of sampling without opening the capacitor cases and they did not have a manufacturer's tag indicating that they were less than 50 ppm PCBs. There was no analytical data indicating that they had been sampled and determined to have less than 50 ppm PCBs. There was no information indicating that they were manufactured after 1978. If they were manufactured prior to 1978 it is likely that the units contain high concentrations of PCBs.



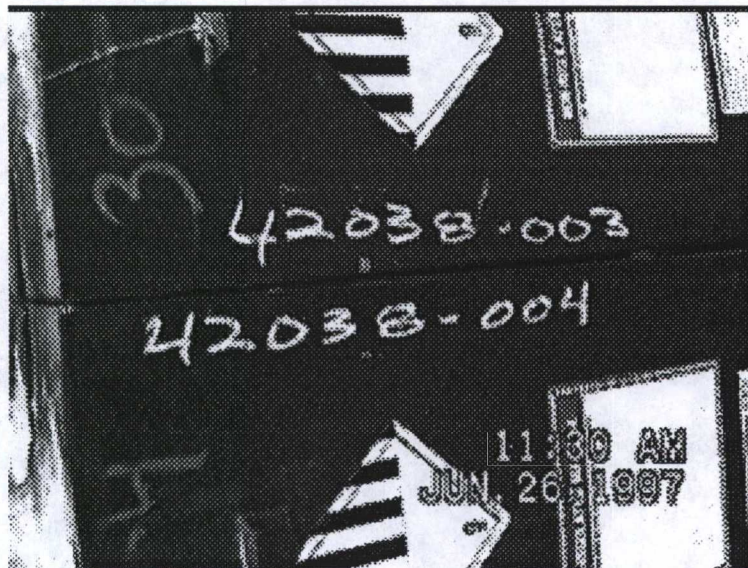


*Four, large High Voltage Capacitors from Wainwright AFB, Fairbanks, Alaska that did not have large PCB a M<sub>l</sub>. These capacitors are marked "non-regulated <50 ppm PCBs".*

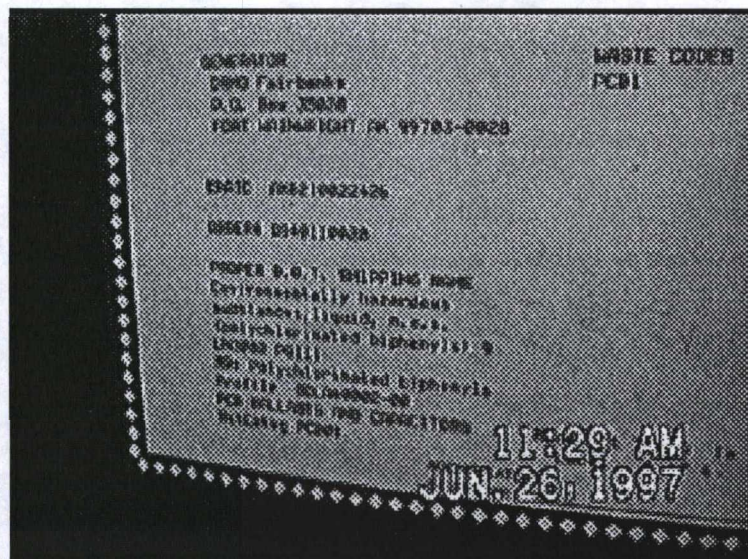


*The capacitors 42038.001 and 42038.002 were marked as "non-regulated material".*



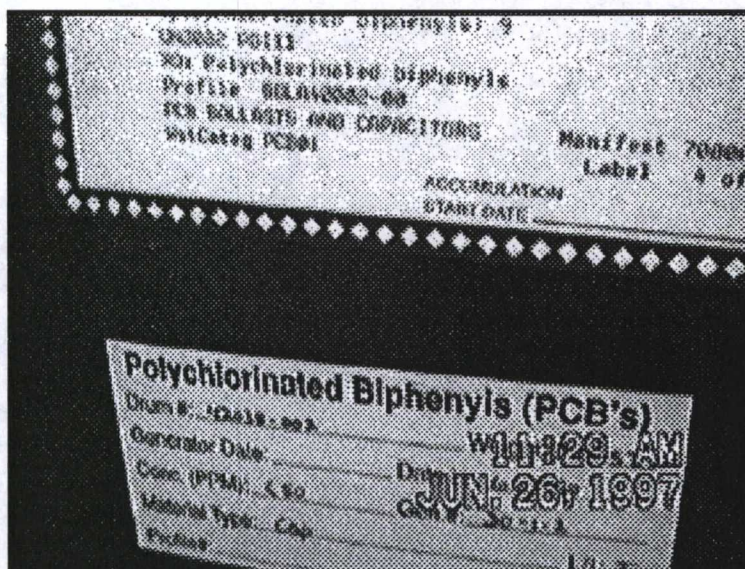


*These capacitors 42038.003 and 42038.004 were also marked as "non-regulated material".*



*The DOT shipping label identified the units as "Ballasts and Capacitors".*

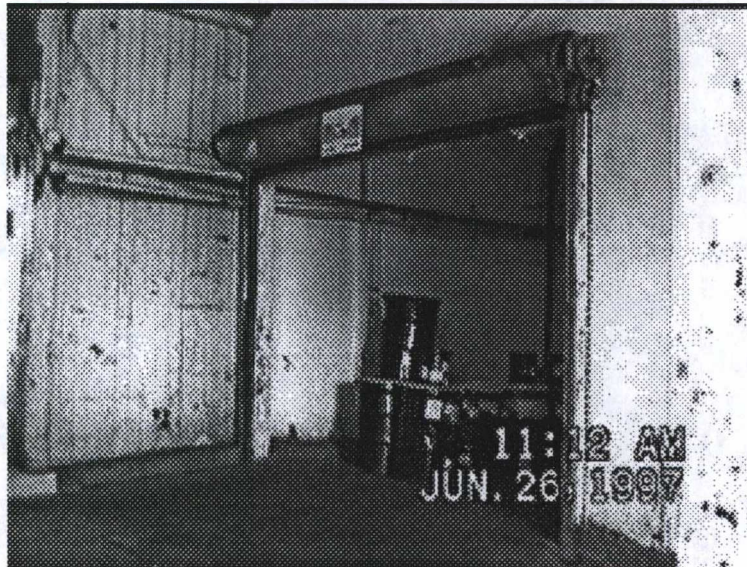




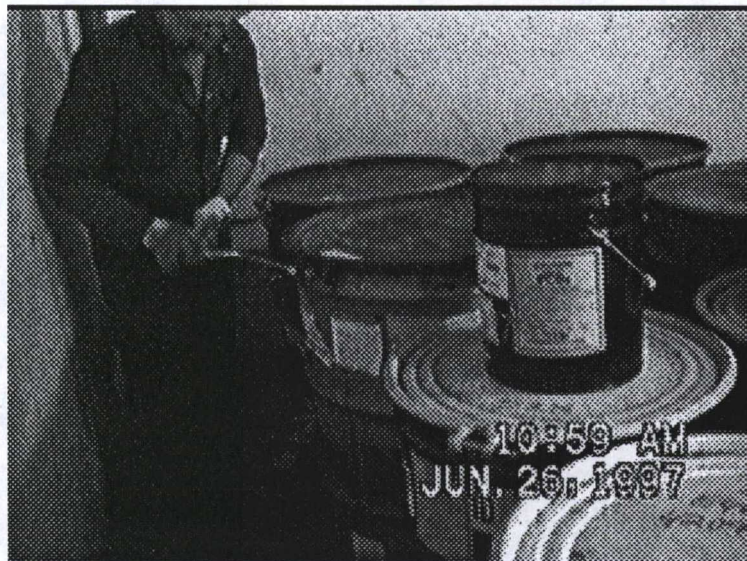
*There was a small "Polychlorinated Biphenyls (PCB's)" label under the DOT label that said the "Cap" contained less than 50 ppm . This label was placed there by Philips Environmental w/o supporting data from the generator or sample analysis.*

In the PCB storage area with a vertical sliding door, there were two 55 gallon drums that were also marked "non-regulated material" and did not have a PCB M<sub>1</sub>. I requested that these drums be opened. They contained burnt out and leaking light ballasts that appeared to have been manufactured prior to 1978. Some of the wiring in one of the ballasts was wrapped in cloth which was a practice that was suspended after the 1950s.



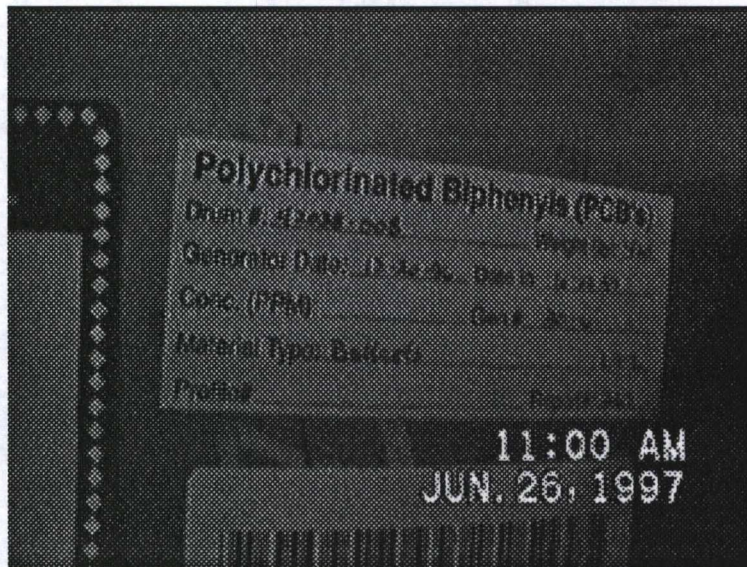


*Storage for disposal area that had two drums of ballasts. The ballasts were leaking. The drums did not have an M1.*

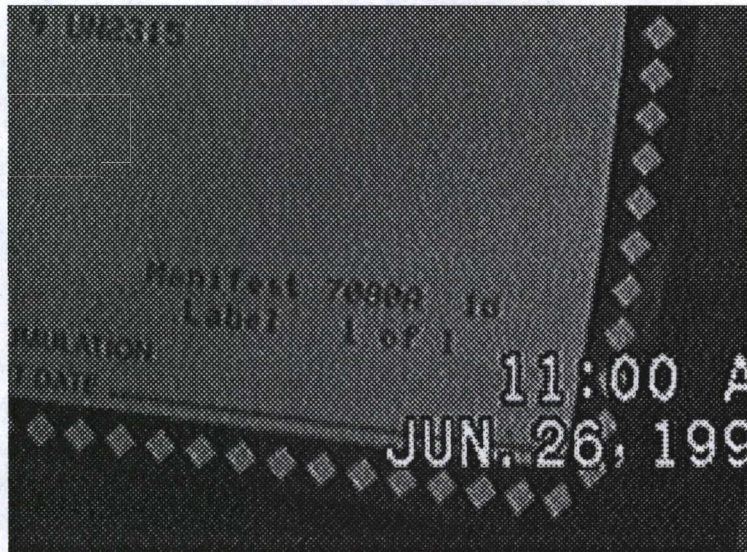


*Opening one of the two drums that contained leaking ballasts. The drum being opened is marked "non-regulated material".*



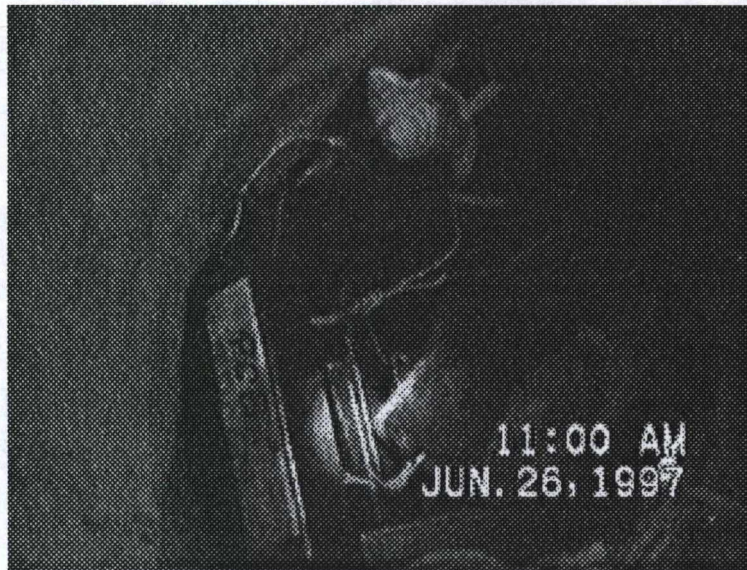


*This image shows the Philips Environmental tracking label. The drum number is 42038-008. The generator date was 12/20/96.*

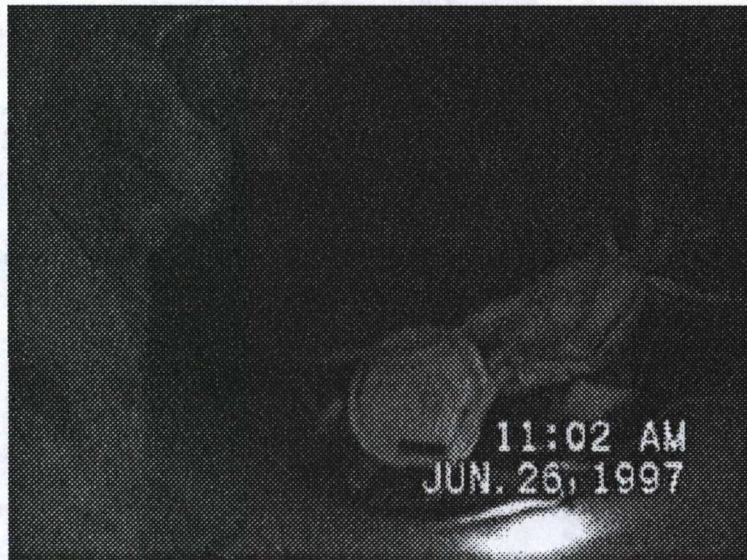


*The drum manifest number was "7080A".*



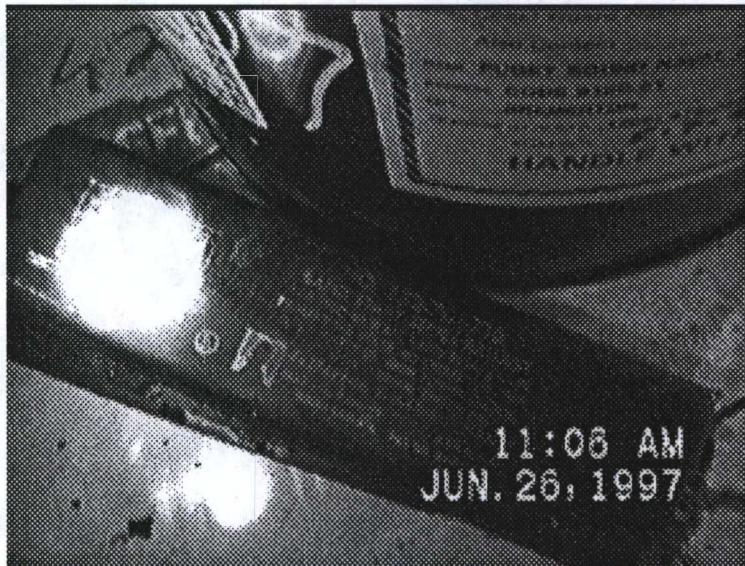


*Ballast clearly marked "PCB" can be seen on the left of the frame. The drum should therefore be marked with an M<sub>1</sub> Instead of a "non-Regulated" label.*



*Drum number 42038-008 also contained oily rags and soiled painter masks along with the broken and leaking light ballasts.*



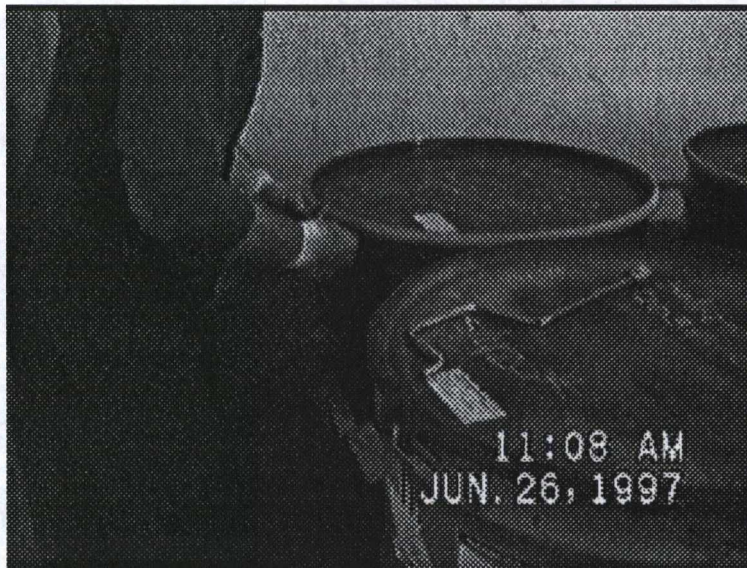


*Jefferson Electric Company ballast with military spec markings "Rapid start series ballast" that was broken into two pieces. The wiring inside was wrapped with cloth which indicated that it was manufactured prior to 1978.*



*The same "Rapid start series ballast" shown above showing front and back pieces.*



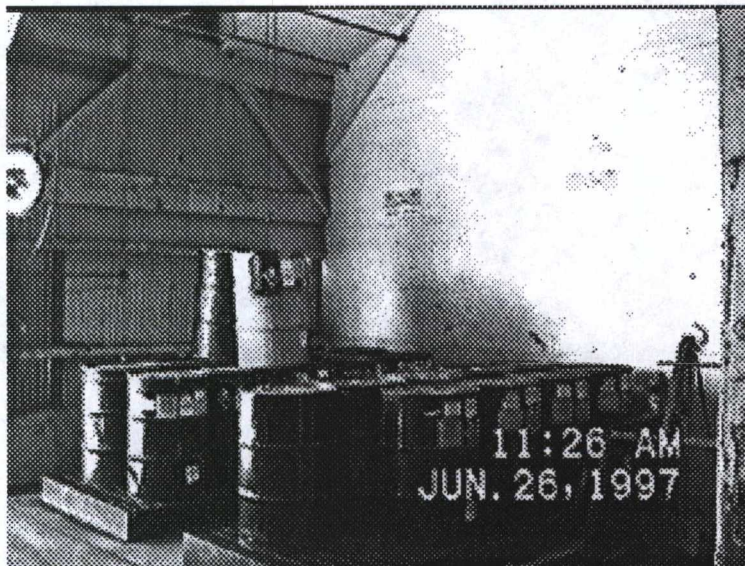


*Opening second drum which also contained leaking ballasts and was also marked as "non-regulated material" and did not have a PCB M<sub>1</sub>.*



*The north PCB storage area. All containers were bermed in steel pans. The two drums in the center foreground pan were leaking around their bungs. Philip Environmental immediately began clean up procedures on the drums.*





*The second north PCB storage area. No leaking drums were observed here. All drums were contained in steel pans with 6" sides.*

The exterior entrances to all of the PCB storage areas were well marked with PCB M<sub>1</sub> labels. None of the pans had leaked or spilled material in them. All drums were in good condition. All drums and PCB containers ready for shipment for disposal were properly marked and logged with a unique bar code label and tracked by Philip Environmental.

#### **CLOSING CONFERENCE:**

I reviewed our observations and asked Warren to document the actions taken on leaking drums and labels and send me a copy along with the documents I requested at the opening conference. He agreed to do that.

#### **POTENTIAL VIOLATIVE ISSUES:**

Ft. Wainwright may have shipped four capacitors without the proper M<sub>1</sub>. There was no information or manufacturer's tag available to verify their assertion that four capacitors were non-regulated. The capacitors appeared old enough to contain high concentrations of PCBs.

Two drums marked "non-regulated" contained leaking PCB light ballasts and should have had M<sub>1</sub> labels.

Two 55-gallon drums of PCB liquids were observed to be leaking

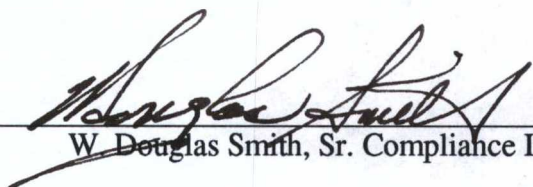


around their bung openings. Philip Environmental initiated clean up immediately upon discovery. The clean up was documented.

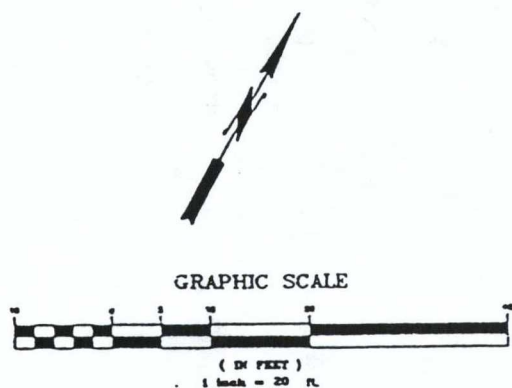
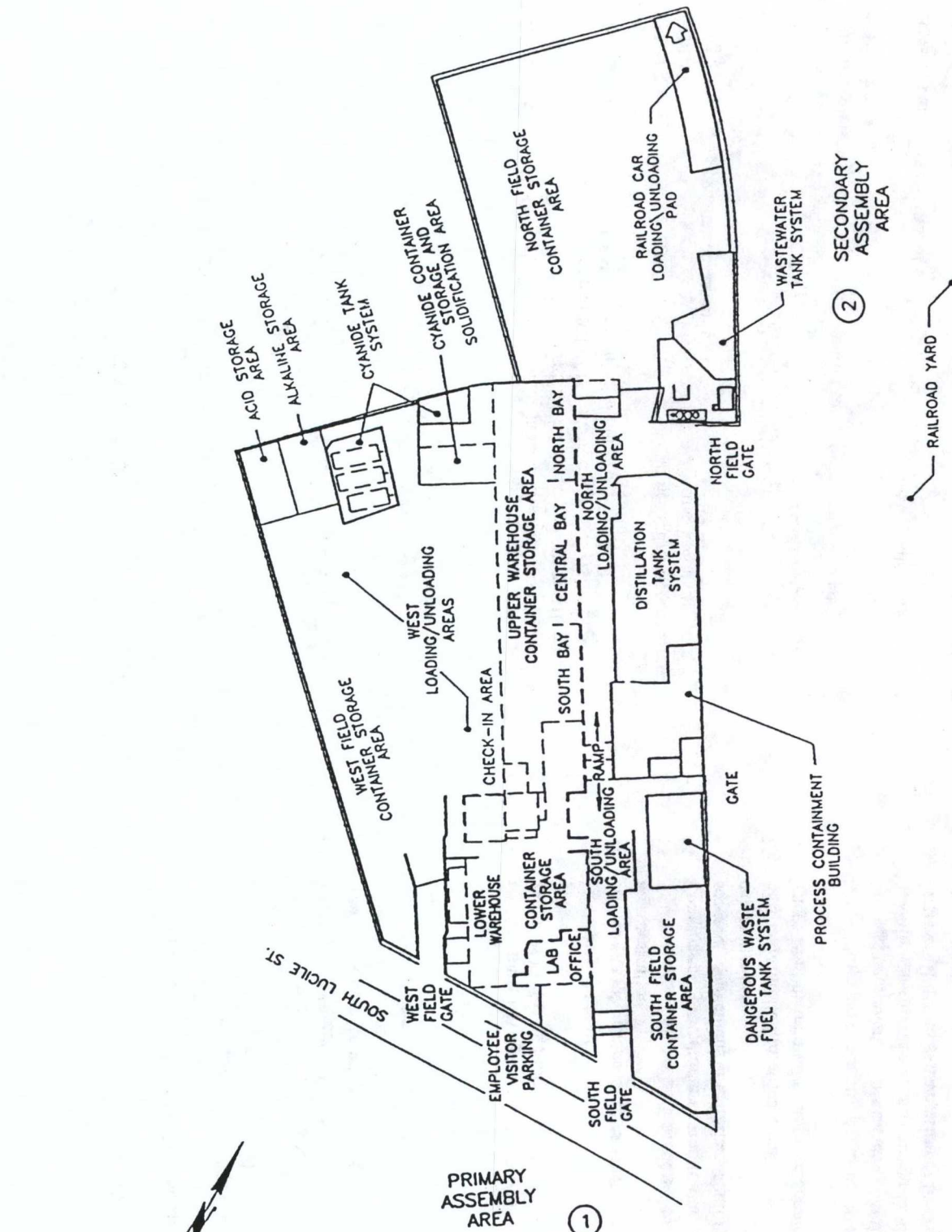
**ATTACHMENTS:**

- A. Notices of inspection
- B. VCR copy of Hi-8 video
- C. Box of combined Philips Environmental Georgetown and Kent annual documents, logs and inventory.

7/8/97  
DATE

  
W. Douglas Smith, Sr. Compliance Investigator





GT\_11\_2



Burlington Environmental Inc.

# GEORGETOWN FACILITY SITE PLAN

GEORGETOWN FACILITY  
SEATTLE, WASHINGTON  
ENGINEERING

FIGURE G1-2





## Georgetown Facility

### SAFETY INFORMATION FOR ALL VISITORS

**ALL GUESTS MUST SIGN THEIR NAME AND TIME WHEN ARRIVING AND EXITING THE FACILITY IN THE REGISTER BOOK LOCATED IN RECEPTION.**

**CONTINGENCY PLAN:** In case of fire, spill or natural diaster, the contingency plan will be implemented. An air horn or fire alarm will sound in the event of an emergency. Facility emergency response personnel will do a sweep of the plant and notify personnel of the emergency. All visitors will proceed to the primary assembly point unless otherwise instructed.

**PRIMARY ASSEMBLY AREA:** Outside south end of facility across South Lucile Street. The evacuation/assembly areas (Primary and Secondary) are identified on the enclosed map.

All visitors shall report directly to the Plant Office for registration. Visitors must review and sign this booklet prior to touring the facility. Upon completion of the tour, this booklet must be returned to the receptionist.

I have read and understand all of the information contained in this safety document.

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

### SITE RULES

1. Absolutely no smoking anywhere on site other than in designated smoking areas.
2. Absolutely no smoking in vehicles in fenced area.
3. All visitors must report to the office to sign-in after entering the fenced area.
4. All visitors must sign-out before leaving property.
5. Facility speed limit is 5 mph.
6. Always use spotter when backing up.
7. Parked vehicles must have the engine off and parking brake set.
8. Do not enter waste process area including route to restrooms or break area unless authorized.
9. Firearms, illegal drugs, and alcohol are not permitted on Philip property.
10. Drivers must have proper PPE in waste process areas. Minimum required PPE is as follows: safety glasses, hard hat, and safety shoes.
11. Horseplay is not permitted.
12. All on-site job related injuries must be reported to Philip administration.
13. Traffic areas shall not be blocked unless authorized to do so.
14. Compressed gas cylinders brought onto site shall be upright and secured. Movement of cylinders shall not take place unless safety cap is in place.
15. PPE is prohibited in office area.
16. There shall be no foul or unprofessional language, behavior, or attire.
17. Only Philip personnel are permitted to process waste or handle process equipment. This includes handling hoses, opening/closing valves, sampling, handling drums, etc.
18. There shall be no consumption of food or beverages inside the fenced area.



**PHILIP**

**ENVIRONMENTAL**

**BY - PRODUCTS  
RECOVERY GROUP**

**Western Region**

20245 77th Avenue South  
Kent, WA 98032

**Gary Cruiger**  
*Plant Superintendent*

Phone (206) 872-8030  
Fax (206) 872-7859  
Cellular (206) 370-0566  
Pager (206) 587-3402

**PHILIP**

**ENVIRONMENTAL**

**BY - PRODUCTS  
RECOVERY GROUP**

**Western Region**

955 Powell Ave. SW  
Renton, WA 98055

**Mark Warner, P.E.**  
*Manager, Regulatory Affairs  
and Risk Management*

Phone (206) 227-6138  
(206) 344-0330  
Fax (206) 227-6179

**PHILIP**

**ENVIRONMENTAL**

**BY - PRODUCTS  
RECOVERY GROUP**

**Western Region**

**Kent Facility**

20245 77th Ave. S  
Kent, WA 98032-1362

**Sharon Estrada**  
*Operations Supervisor*

Phone (206) 872-8030  
(206) 872-7859  
Fax (206) 393-0377



# ENVIRONMENTAL PROTECTION AGENCY TSCA INSPECTION CHECKLIST

Facility Name / Address      Facility Representative / Title      Inspection Date/Time      Inspector Name / ID

Yes    No

## GENERAL

- \_\_\_\_\_ Has any PCB equip been converted to PCB-Cont or Non-PCB equip?  
 \_\_\_\_\_ If yes, was PCB concentration tested after 3 mos of service? Obtain results  
 \_\_\_\_\_ Have any PCB spills occurred at the facility? Obtain details 7  
PCBs resulting from the cleanup and removal of spills, leaks, or other uncontrolled discharges, must be stored and disposed of in accordance with 40CFR § 761.60(a). Disposal of PCBs by any other manner constitutes the improper disposal of PCBs.

## WASTE OILS

- ✓ Are waste oils tested for PCB's?  
✓ Are waste oils generated, used, or stored at the facility?  
 What is the source of the waste oils? Clients  
✓ Are waste oils picked up by a recycler?  
 Name of recycler? <50ppm Non TSCA to Holium  
✓ Are waste oils burned at the facility?  
 If yes: Has facility notified EPA-RCRA as used oil burner?  
✓ Have any waste oils (50-500ppm) been shipped to a disposal facility? Who? Aptos, Aragonite (Rollins)  
✓ Have any waste oils (50-500ppm) been sold for fuel or burned in a high efficiency boiler?  
✓ If yes, was EPA notified of initial burn in the HEB? 761.60(a)(2)  
✓ Are waste oils used or sold for: Road Oil, Dust Control, Rust Prevention, Sealants, Pesticide/Herbicide Carriers? 761.20(d)  
✓ Are bulk storage tanks used for waste oils? (>55 gal DOT drum specs)  
✓ Is an SPCC plan available for PCB-Contaminated bulk storage tanks?  
N/A Are bulk storage tanks labeled? (Must label if PCB concentration is unknown or >50ppm.)  
N/A Are in-out records (date/amt) available for bulk storage? 761.65(c)(8)  
✓ Have PCB fluids (>500 ppm) ever been added to bulk storage tanks?  
N/A Have PCB Contam fluids (50-500 ppm) ever been added to <50 ppm PCB bulk storage tanks?

## STORAGE FOR DISPOSAL 761.65

- ✓ Is there a designated Storage for Disposal Area (SFD)? (2 locations) + temp storage for large transformers  
✓ Marked with 6x6 M<sub>L</sub> label?  
✓ Adequate Roof and Walls to prevent rain from reaching PCB's or PCB items?  
✓ Adequate Floor (smooth - impervious) with continuous 6" minimum curbing?  
✓ Any drains or expansion joints present in the floor? EPP joint, sealed  
✓ Any sewer drains or sumps located in the SFD? Blind sump  
 Is containment volume adequate?  
 (At least 2x internal volume of the largest PCB article/container or 25% of the total internal volume of all PCB articles or containers in storage.) ?  
✓ Is the SFD above the 100-yr flood water elevation?  
✓ Are any PCB's or PCB items stored within the SFD? Itemize-obtain inventory once/month, bar code.  
✓ Are items dated when placed into storage?  
✓ Are items checked every 30 days for leaks? Daily  
✓ Are leaks cleaned up immediately? Are leaking items overpacked? or repacked.  
✓ Are PCB-T, PCB Containers, or PCB Capacitors marked with M<sub>L</sub>?  
✓ Are any PCB-T in storage? How many? 2  
✓ Are any PCB-T declared "for disposal" stored outside of the SFD?  
✓ Are any PCB-Contam Elec Equip or PCB-Cap declared "for disposal" stored outside the SFD?  
 If yes: 1. Is space = 10% of the volume of the Contaminated Trans available in the SFD?  
 2. Are weekly inspections for leaks performed?  
✓ Are any other areas being used to store PCB items for disposal? 761.65(c) ✓  
✓ Are items Dated? \_\_\_\_\_ Marked? \_\_\_\_\_  
✓ Is the 30 day temporary storage limit observed? (solids only)  
✓ Are containers in a temporary storage area marked with M<sub>L</sub> and date removed from service?



**STORAGE FOR DISPOSAL** (Continued)

| <u>Yes</u>                          | <u>No</u>                           |  |
|-------------------------------------|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Are liquids in containers >500 ppm?  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | If yes, are containers marked >500 ppm PCB?  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | (Temporary storage is NOT allowed for PCB liquids (>500 ppm))                            |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Are PCB liquids (>500ppm) stored anywhere other than the SFD area?                       |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Have any PCB's or PCB items been shipped to a disposal facility within the last 5 years? |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Are shipping papers/manifests available for shipments?                                   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Are any Mineral-Oil-T in storage? How many? ____   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Are any Mineral-Oil-T in storage leaking?  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Have these Mineral-Oil-T been tested for PCB's? (Obtain Serial No's and Test Records)    |

**TRANSFORMERS**

|                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | Are any PCB-T (>500 ppm) in use?  |
| <input checked="" type="checkbox"/> | Does facility own any PCB-T located in a Food/Feed facility? (Prohibited after 10/1/85)                     |
| <input checked="" type="checkbox"/> | Are any PCB T in a Network or Radial configuration?   |
| <input checked="" type="checkbox"/> | What is the secondary voltage of the T?   |
| <input checked="" type="checkbox"/> | Are T tested for PCB's by Gas-Chromatograph?  |
| <input checked="" type="checkbox"/> | Have any PCB-T been installed (new location) since 10/1/85? Where? ____ When? ____                          |
| <input checked="" type="checkbox"/> | Have all PCB-T been registered <i>In writing</i> with primary fire response agency? Obtain copy             |
| <input checked="" type="checkbox"/> | What is the Primary Fire Response Agency? ____  |
| <input checked="" type="checkbox"/> | Were any leaking Mineral-Oil Transformers observed?   |
| <input checked="" type="checkbox"/> | Were any leaking PCB-T or PCB-Contam-T observed? (Get serial numbers, location)                             |
| <input checked="" type="checkbox"/> | Is clean-up of leaks initiated within 48 hours of discovery?  |
| <input checked="" type="checkbox"/> | Are daily checks of active leaks and drip pans made until leak is repaired or T is replaced?                |
| <input checked="" type="checkbox"/> | Are PCB testing records available for all T?  |
| <input checked="" type="checkbox"/> | Are PCB testing records available for leaking Mineral-Oil Transformers? OBTAIN RECORDS                      |
| <input checked="" type="checkbox"/> | Are PCB-T labeled with 6x6 M <sub>L</sub> ?   |
| <input checked="" type="checkbox"/> | Have any Mineral-Oil-T been tested and found to be >500 ppm PCB?  |
| <input checked="" type="checkbox"/> | Are means of access to PCB-T vaults/enclosures (exclude grates & manhole covers) marked w/ M <sub>L</sub> ? |
| <input checked="" type="checkbox"/> | Do all T have nameplates or documentation specifying type of dielectric fluid?                              |
| <input checked="" type="checkbox"/> | Are PCB-T serviced on site?   |
| <input checked="" type="checkbox"/> | Are PCB contaminated rags/other wastes generated by servicing placed into drums in the SFD?                 |
| <input checked="" type="checkbox"/> | Are PCB's removed from the T during servicing?  |
| <input checked="" type="checkbox"/> | If yes, are PCB's put back into the Transformer or placed into the SFD?                                     |
| <input checked="" type="checkbox"/> | Are PCB-T coils removed during servicing? (Prohibited)  |
| <input checked="" type="checkbox"/> | Are PCB liquids (>500 ppm) stored on site for servicing PCB-T? (Must be in SFD)                             |
| <input checked="" type="checkbox"/> | Are service records available for PCB-T?  |
| <input checked="" type="checkbox"/> | Are Quarterly PCB-T inspections made (start 8-10-81)?   |
| <input checked="" type="checkbox"/> | Are Quarterly inspection records maintained for at least 3 years after disposal?                            |
| <input checked="" type="checkbox"/> | Do Quarterly PCB-T inspection records include?  |
| <input checked="" type="checkbox"/> | Location ____ Inspection Date ____ Inspectors Name ____   |
| <input checked="" type="checkbox"/> | Date Leak Discovered ____ Location of Leak ____ Estimate of PCB released ____                               |
| <input checked="" type="checkbox"/> | Date of Cleanup ____ Containment ____ Repair ____ Description of Cleanup ____                               |
| <input checked="" type="checkbox"/> | Annual inspections may be performed in lieu of Quarterly IF:  |
| <input checked="" type="checkbox"/> | 1. Secondary containment of 100% of the capacity of the T is provided or                                    |
| <input checked="" type="checkbox"/> | 2. PCB Conc of T is <60,000ppm, 90 days after service to reduce the PCB conc.                               |
| <input checked="" type="checkbox"/> | Have there been any fires involving PCB-T?  |
| <input checked="" type="checkbox"/> | If yes, Date? __, Who responded? __, Did T rupture? ____  |
| <input checked="" type="checkbox"/> | Was fire reported to National Response Center?  |
| <input checked="" type="checkbox"/> | Are combustible materials stored: Inside a PCB-T enclosure?   |
| <input checked="" type="checkbox"/> | Within 5 meters of a PCB-T enclosure?   |
| <input checked="" type="checkbox"/> | Within 5 meters of a PCB-T?   |

**CAPACITORS**

*Small capacitor -- a capacitor which contains <3# of dielectric fluid (<100 cubic in)*  
*Large High Voltage Capacitor -- >=3# dielectric fluid and which operates at >=2000 volts*  
*Large Low Voltage Capacitor -- >=3# dielectric fluid and which operates below 2000 volts a.c. or d.c.*  
*Light ballasts are regulated for commercial sources.*

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | Are any PCB-Capacitors in use or in storage? How many? ____            |
| <input checked="" type="checkbox"/> | Are >=49 LHV or LLV C in use or storage?                               |
| <input checked="" type="checkbox"/> | If yes, are these C included in the Annual Report?                     |
| <input checked="" type="checkbox"/> | Are C marked with M <sub>L</sub> ? (LHVC in service need to be marked) |



**CAPACITORS** (Continued)

Yes No

- \_\_\_\_\_ Has facility ever had >49 LHV/LLV C in use or storage within the last 5 years?  
 \_\_\_\_\_ If yes, are annual reports on file for years when >49 C were in use or storage?  
 \_\_\_\_\_ Have any C been removed from service?  
 \_\_\_\_\_ If yes, have C been individually labeled with M<sub>L</sub>?  
     Note: LLVC (<2000 volts) in service do not need M<sub>L</sub>.  
     LLVC (<2000 volts) must be labeled upon removal from service.  
 \_\_\_\_\_ Are all Caps equipped with nameplates specifying type of dielectric fluid?  
     (Capacitors without nameplates must be assumed to be PCB Capacitors.)  
 \_\_\_\_\_ Are any PCB-C owned or maintained by the facility located in a Food or Feed Facility (FFF)?  
     (These must be removed as of 10-1-88.)  
 \_\_\_\_\_ ✓ Are any C manufactured after 7-1-78 in use at the facility? (in storage)  
     If yes, are these C marked "No PCB's" if they contain none?  
 \_\_\_\_\_ Were any leaking C observed during the inspection?  
     Note: Use of PCB-C after 10/1/88 is prohibited except for:  
     1. Restricted Access and Contained Indoor Installation (Caps must be fenced off)  
     2. Restricted Access Substation (Caps must be fenced off)

**ANNUAL DOCUMENTS**

Annual Document Logs should constitute single documents which include all of the required elements identified in § 761.180(a).  
 Annual Records constitute all signed manifests and all Cert of Disposal received during the calendar yr.  
 Annual REPORTS are required to be submitted by a COMMERCIAL STORER ONLY by 7/15 and is based on ADL & A. Records

- ✓ Are Annual Document Logs (ADL) and Annual Records (AR) available?  
 ✓ Are ADL on calendar year basis? (§761.180(a)) -- 1989 must cover 1/1/89-2/5/90. 1990 (2/6/90-12/31/90)  
 ✓ Are PCB-T removed from service itemized in ADL?  
 Not Alw Is the Total Weight (kg) of PCB's contained in these transformers shown? size shown  
 ✓ Date removed from service?  
 ✓ Date placed into storage?  
 ✓ Date placed into transport for disposal?  
 ✓ Is Number of PCB-T and Total Wt (kg) of PCB's remaining in service at calendar year end shown?  
 ✓ Are LHV/LLV PCB Capacitors removed from service itemized?  
 ✓ Date removed from service?  
 ✓ Date placed into storage?  
 ✓ Date placed into transport for disposal?  
 ✓ Is the number of PCB LHV/LLV Caps remaining in service at year end shown? (Annual Report)  
 ✓ Is the number of PCB Containers in the SFD area shown? Annual RPT  
 ✓ Is the Weight (kg) of these PCBs also shown?  
 ✓ Are the container contents identified?  
 ✓ Are PCB items in containers listed?  
 ✓ Date container placed into storage shown?  
 ✓ Date container placed into transport for disposal shown?  
 ✓ Are names/locations of disposal/storage facilities for PCB shipments shown?  
 ✓ Have any intermediate storage/disposal areas been used for PCB items earmarked for disposal? Solids only, westfield  
 ✓ Are ADL kept for 5 years?  
 ✓ Does ADL list the unique manifest number for all shipments during year? §761.180(a)(2)(ii)(C)  
 ✓ Do ADLs list total no of PCB containers and the total wt in KG of the contents of PCB containers?  
 ✓ Does each manifest include the following information.  
     For bulk PCB waste -- Weight in kg \_\_\_\_\_ First date it was removed fr serv for disp \_\_\_\_\_  
     Date placed into transport \_\_\_\_\_ Date of disposal if known \_\_\_\_\_  
     T & C SN or ID of each article \_\_\_\_\_ Weight in kg of the PCB waste in each T or C ✓  
     OutSDate \_\_\_\_\_ InTransport Date \_\_\_\_\_ DisposalDate \_\_\_\_\_  
     Containers Unique PCB container number \_\_\_\_\_ Description of contents \_\_\_\_\_  
     Total wt of each container \_\_\_\_\_ Out of Service Date for material in container \_\_\_\_\_  
     Date container put into transport for disposal \_\_\_\_\_ Date of Disposal \_\_\_\_\_



### SPECIAL QUESTIONS

- ☒ Is Anthraquinone (a.k.a. 9,10-Anthracenedione (CAS# 84-65-1) used by the facility in any process (Pulp & Paper)  
If yes, get use description, length of use, supplier, testing for supplier, correspondence re anthraquinone.
- ☒ Are any elevator hydraulic systems in use. Oils should be tested for PCB content.
- ☒ Are any Diarylide or Phthalocyanin pigments in use or storage? 761.30(g)
- ☒ Is any PCB mining equipment used or located at facility? 761.30(c)
- ☒ Are any Railroad-T in use or located at facility? 761.30(b)
- ☒ Was PCB conc measured after service or within 12-24 mo after PCB conc was reduced?
- ☒ Are records kept of service, testing, use, storage, and disposal? (Must keep until 1-1-91)
- ☒ Are any heat transfer systems containing PCB's in use? 761.30(d)
- ☒ Are annual tests for PCB concentration made? Date of last test?
- ☒ Have any annual tests shown PCB concentration to be >50ppm?
- ☒ If yes, has system been drained and refilled with <50ppm PCB fluid?
- ☒ Are these annual testing records kept for 5 years?
- ☒ Are any PCB Electromagnets in use or storage at the facility? How many?
- ☒ Have Electromagnets been tested for PCB concentration?
- NOTE: Non-PCB fluid may be used to top-off Electromagnets. (Removal of internals prohibited)
- ☒ Are Hydraulic systems containing PCB's in use? 761.30(e)
- ☒ Has annual testing for PCB concentration been performed since 11/01/79?
- NOTE: Annual tests are not required after PCB concentration reaches <50ppm.
- ☒ Have any annual tests shown PCB concentration to be >50ppm?
- ☒ If yes, has system been drained and refilled within 6 mos of test with <50ppm PCB fluid?
- ☒ Was exemption obtained from EPA for use of hydraulic fluid containing >50ppm PCB?
- NOTE: Hydraulic Systems containing >50 ppm PCB are PROHIBITED after 7/1/84.
- ☒ Does facility use, recycle or dispose of Lead (Pb)? Solder • smelter • shooting range • mine • other?

### COMMERCIAL BUILDING REGULATIONS

- ☒ Are means of access to PCB-T locations (excluding grates & manhole covers) marked with M<sub>L</sub>?
- ☒ Are any commercial buildings located on facility property? (Building w/public & employee access)
- ☒ Are any PCB-T IN or WITHIN 30 METERS of the Commercial Building?
- ☒ If yes, how many? \_\_\_\_ Where located? \_\_\_\_
- ☒ Who owns the PCB-T? \_\_\_\_
- ☒ If owned by Utility, are the PCB-T registered IN WRITING with building owner?
- ☒ If owned by the building owner, are PCB-T registered in writing with fire department?
- ☒ Are any PCB-T located in a sidewalk vault?
- ☒ Do they have current-limiting fuses (or other equivalent protection) to detect:
- ☒ Sustained high current faults?
- ☒ Sustained low current faults?
- ☒ Are PCB-T: Radial? \_\_\_\_ Network? \_\_\_\_ High Secondary Voltage 480V? \_\_\_\_
- ☒ Low secondary voltage? \_\_\_\_
- ☒ Do LSV Network and HSV Radial PCB-T in/near the Cmercl Bldg have enhanced elect protect?
- ☒ Current-limiting fuses? \_\_\_, Overcurrent protective relays? \_\_\_, Circuit Breakers? \_\_\_,
- ☒ Heat or Ultraviolet sensors? \_\_\_, Pressure sensors? \_\_\_, Fluid Level Sensor? \_\_\_\_

### INSPECTION PROCEDURES

- ☒ Were Inspector's credentials presented?
- ☒ Was "Notice of Inspection" presented?
- ☒ Was "TSCA Inspection Confidentiality Notice" presented?
- ☒ Were photographs taken?
- ☒ Were samples taken during the inspection?
- ☒ Was a "Receipt for Samples and Documents" given to the facility representative?
- ☒ Were Chain of Custody procedures followed for samples?
- ☒ Were split samples offered to the facility?
- ☒ Were split samples given to the facility?
- ☒ Was warrant required?

Reason for Inspection: Neutral Scheme ☒ Complaint \_\_\_\_\_ Informant \_\_\_\_\_

Agency Referral \_\_\_\_\_ Follow-Up \_\_\_\_\_

Multimedia \_\_\_\_\_





United States Environmental Protection Agency  
Washington, D.C. 20460  
Toxic Substances Control Act  
NOTICE OF INSPECTION

Form Approved  
OMB No. 2070-0007  
Approval Expires 07-31-96

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|  |                       |                     |         |  |
|--|-----------------------|---------------------|---------|--|
| 1. Investigation Identification  |                       |                     | 2. Time | 3. Firm Name   |
| Date<br>6/26/97  | Inspector No.<br>3124 | Daily Seq. No.<br>1 | 0900    | Philip Services  |
| 4. Inspector Address<br>U.S. EPA<br>1200 6 <sup>th</sup> Ave, N/S OEA-095<br>Seattle, WA 98101 |                       |                     |         | 5. Firm Address<br>DBA Burlington<br>734 S. Luile<br>Seattle, WA 98108 |

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

- ☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

☐ In addition, this inspection extends to (Check appropriate blocks):

- |  |  |
|--|--|
| <input type="checkbox"/> A. Financial data | <input type="checkbox"/> D. Personnel data |
| <input type="checkbox"/> B. Sales data     | <input type="checkbox"/> E. Research data  |
| <input type="checkbox"/> C. Pricing data   |  |

The nature and extent of inspection of such data specified in A through E above is as follows:

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

|   |                        |   |                        |
|---|------------------------|---|------------------------|
| Inspector Signature<br><i>[Signature]</i> |                        | Recipient Signature<br><i>[Signature]</i> |                        |
| Name<br>D. Douglas Smith                  |                        | Name<br>MARK WARNER                       |                        |
| Title<br>Sh. Compliance Investigator      | Date Signed<br>6/26/97 | Title<br>Regulatory Affairs Mgr           | Date Signed<br>6/26/97 |





United States Environmental Protection Agency

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| Name<br>D. Douglas Smith                  |                        | Name<br>MARK WARNER                       |                        |
| Title<br>Sr. Compliance Investigator      | Date Signed<br>6/26/97 | Title<br>Regulatory Affairs Mgr           | Date Signed<br>6/26/97 |





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| Name<br>D. Douglas Smith                  |                        | Name<br>MARK WARNER                       |                        |
| Title<br>In Compliance Investigator       | Date Signed<br>6/26/97 | Title<br>Regulatory Affairs Mgr           | Date Signed<br>6/26/97 |





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Washington, D.C. 20460  
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| 1. Investigation Identification  |                       |                     | 2. Firm Name   |
| Date<br>6/26/97  | Inspector No.<br>3124 | Daily Seq. No.<br>1 | Philip's Environmental   |
| 3. Inspector Name<br>W. DOUGLAS SMITH  |                       |                     | 4. Firm Address<br>734 S. Lucile<br>Seattle, WA 98105            |
| 5. Inspector Address<br>U.S. EPA<br>1200 6 <sup>th</sup> Ave, N/S OEA-095<br>Seattle, WA 98101 |                       |                     | 6. Chief Executive Officer Name<br>Chuck Benke                   |
|  |                       |                     | 7. Title<br>Group Vice Pres. (Burlington Enviro)<br>DBA Philip's |

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

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|                                |         |
|--------------------------------|---------|
| Signature<br>Mark Warner       | Name    |
| Name<br>MARK WARNER            | Title   |
| Title<br>Regulator Affairs Mgr | Address |
| Date Signed<br>6/26/97         |         |





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Washington, D.C. 20460  
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| Date<br>6/26/97  | Inspector No.<br>3124 | Daily Seq. No.<br>1 | Philip Environmental  |
| 3. Inspector Name<br>W. DOUGLAS SMITH  |                       |                     | 4. Firm Address<br>734 S. Lucile<br>Seattle, WA 98108           |
| 5. Inspector Address<br>U.S. EPA<br>1200 6 <sup>th</sup> Ave, N/S OEA-095<br>Seattle, WA 98101 |                       |                     | 6. Chief Executive Officer Name<br>Chuck Benke                  |
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|                                |         |
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| Signature<br>Mark Warner       | Name    |
| Name<br>MARK WARNER            | Title   |
| Title<br>Regulator Affairs Mgr | Address |
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United States Environmental Protection Agency  
Washington, D.C. 20460

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